

**Before the  
Federal Communications Commission  
Washington, D.C. 20554**

In the Matter of	)	
	)	
Amendment of Part 2 of the Commission's	)	
Rules to Allocate Spectrum Below 3 GHz for	)	
Mobile and Fixed Services to Support the	)	CC Docket No. 00-258
Introduction of New Advanced Wireless	)	
Services, Including Third Generation Wireless	)	
Systems	)	

To: The Commission

**REPLY COMMENTS OF  
Philips Business Communications**

Philips Business Communications hereby submits reply comments in response to the Commission's Memorandum Opinion and Order and the Further Notice of Proposed Rulemaking (MO&O and FNPRM) that examines additional spectrum band options to support advanced wireless services.

Philips Business Communications (PBC) is a leading provider of business communications solutions to medium-sized and large enterprises. Customers are served through a network of 50 sales organizations, distributors, dealers and value added resellers. Worldwide development, marketing, sales and services are directed from the company's headquarters in Hilversum, the Netherlands. PBC is recognized as a front runner in wireless enterprise communication solutions providing infrastructures, peripherals and applications.

With over 12 million end users, Philips Business Communications is an established name in the business communications market.

PBC is a business unit of Royal Philips Electronics, one of the world's biggest electronic companies with sales activities in more than 60 countries.

After reviewing the comments of other parties in this proceeding, we notice that – among other things - some parties recommend to retain the 1910-1930 MHz band for isochronous and advanced services and some parties suggest to reallocate the 1910-1930 MHz band or parts of this band either for mobile services or for MDS.

We support the comments that recommend retaining the isochronous UPCS band because:

- UPCS is the only band that provides spectrum for real-time services such as voice.
- Dedicated allocation for isochronous services improves spectrum efficiency and reduces levels of interference.
- It will increase Quality of isochronous services.

We support to extend the isochronous UPCS band to 1910 MHz.

We support comments to deploy also IMT-2000 FDMA/TDMA terrestrial radio interface to the extended UPCS band because:

- IMT-2000 FDMA/TDMA meets the basic rules for unlicensed operation in the 1910 – 1930 MHz band.
- IMT-2000 FDMA/TDMA coexist with existing UPCS devices.

We recommend that the UPCS band and the IMT-2000 FDMA/TDMA rules to be aligned for co-existence in this band. This involves among others the enhancement of parameters to cover an US-standard house and channelization.

We oppose those comments, which propose to re-use the extended UPCS band for other use than isochronous services because:

- Spectrum for low power, unlicensed and uncoordinated technologies serve the public interest.
- UPCS is the only band that provides spectrum for real-time services such as voice.
- We expect more and more voice, voice related and advanced services moving from the other bands to this band.

Respectfully submitted

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Dated: 24-04-2003